

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UBIQUITI, INC.,

Plaintiff,

v.

BRIAN KREBS and KREBS ON
SECURITY, LLC,

Defendants.

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Civil Action No. 1:22-CV-00352-RDA-IDD

DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME

Pursuant to Local Rule 7, Defendants Krebs on Security, LLC and Brian Krebs ("Defendants"), by and through undersigned counsel, move for an extension of time to respond to Plaintiff's Complaint, the response to which is currently due on August 3, 2022.

Plaintiff and Defendants have executed a term sheet for resolving this dispute and are in the process of finalizing their settlement agreement that will dispose of the litigation. They expect this process to be completed over the next couple of weeks. The process has taken longer than expected due to summer plans and other client demands. Under the circumstances, to avoid unnecessary work for the parties and the court as well as unnecessary litigation expenses, and to avoid having to seek another extension if the process again takes longer than anticipated, good cause exists for an extension until September 2, 2022 for Defendants to respond to the Complaint. Neither side will be prejudiced by the requested extension.

Defendants' counsel has conferred with Plaintiff's counsel who indicated that Plaintiff does not oppose Defendants' request for an extension until September 2, 2022 for Defendants to respond to the Complaint.

Accordingly, Defendants respectfully request that they be given until and including September 2, 2022 to respond to the Complaint in this case.

NOTICE OF WAIVER OF ORAL ARGUMENT

Defendants waive oral argument with regard to this Unopposed Motion to Extend Time.

Dated: August 3, 2022

Respectfully Submitted,

/s/ David S. Wachen

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Attorneys for Defendants

Krebs On Security, LLC and

Brian Krebs

CERTIFICATE OF SERVICE

I hereby certify that, on this 3rd day of August, 2022, I caused a copy of the foregoing to be filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ David S. Wachen

David S. Wachen (VSB No. 96363)